

EXHIBIT B

From: Willie Dennis <woc2020@gmail.com>
Date: 24 May 2022 at 1:47:18 PM GMT-4
To: Neil Kelly <Neil_Kelly@fd.org>
Cc: Willie Dennis <woc2020@gmail.com>
Subject: Re: Discovery demand-Comments

Dear Mr Kelly,

I have reviewed the draft disclosure request in detail. I have also consulted with several of my prior civil and criminal attorneys who are strongly convinced of my innocence and listened in on the call with the Court on May 2, 2022

All my prior lawyers agree that to establish my innocence we need to obtain evidence of the “**context**” in which the allegedly harrassing e-mails were conceived of and transmitted. To that end the information I seek is **material tending to prove or demonstrate the allegations in the EEOC complaint, including but not limited to:**

- KL Gates had systematically violated the partnership agreement in denying my rights to compensation
- KL Gates had systematically violated applicable law, as well as the partnership in allowing conduct by partners and senior management **constituting sexual harassment**, putting the firm at serious financial risk
- KL Gates had systematically violated applicable law, as well as the partnership agreement in allowing conduct by partners and senior management constituting racial bias and discrimination against persons of color, putting the firm at serious financial risk
- KL Gates had systematically violated applicable law, as well as the partnership agreement in allowing conduct by partners and senior management constituting gender bias and discrimination, putting the firm at serious financial risk
- KL Gates did in a multiplicity of ways, violate the firm's partnership agreement by "terminating" me without the required process, preventing me from communicating with fellow partners regarding key firm issues, as described above, or from continuing to maintain client relationships that I had initiated, cultivated, and maintained
- KL Gates had violated New York's legal ethical rules by communicating with my ex wife, and her counsel, in a way that destroyed my ability to protect my position in post judgment enforcement proceedings, to my disastrous financial disadvantage

As we have discussed, most of the material sought is created and maintained in the ordinary course of the Firm's business, so the Firm's failure to produce the requested items further condemns their behavior and the complaints they have alledged.

Item 8 Brady and Giglilon Material

A. Minutes of the Meetings of the Executive Committee of the Firm

The minutes of the Executive Committee of the Firm, members in attendance, resolutions passed and all communications (whether in "hard copy," electronic, or any other form, and including (without limitation) emails, text messages, instant messages, voicemails and any other recordings or recordations) from, to or copying any member of the Firm "Communications" that concern, refer or relate to, or otherwise involve (or involved) Mr Dennis with respect to the following:

1. the suspension of Mr Dennis from the Firm on January 19, 2019;
2. the settlement proposal delivered to Mr Dennis on January 30th 2019
3. the expulsion of Mr Dennis from the Firm on May 20, 2019;
4. the decision by the Firm to file a criminal complaint with the District Attorney;
5. the decision by the Firm to file a criminal complaint with the Southern District;
6. the decision by the Firm to hire a private investigation firm to surveil Mr Dennis at the Corporate Counsel Women of Color at its annual conference in September of 2019
7. the decision by the Firm to alter the compensation arrangement between Mr Dennis and [REDACTED];
8. the decision by the Firm to not meet with [REDACTED] of [REDACTED] during all of 2018.
9. the decision by the Firm not to institute Mr Dennis suggestions of "best practices" with respect to sexual harassment complaints made by women attorneys of the Firm

To the extent there were no Firm meetings with respect to these matters, the persons who made such decisions and the basis of their authority should be identified. Such material must include the communications between, among others, [REDACTED] (Executive Committee member and the Global Head of Labor and Employment practice)

B. Sexual Harassment

1 All communications between the members of the Executive Committee of the Firm relating to Mr Dennis request after reviewing this article in December 2018 <https://www.law.com/thelegalintelligencer/2018/12/12/at-kl-gates-women-alleged-misconduct-and-left-as-accused-partners-stayed-on/>, for a more transparent sexual harassment process within the Firm.

2 The names of all partners who had sexual harassment complaints filed against them
(We need to determine if any of the witnesses testifying against me were accused of sexual harassment)

3 All e-mails between the members of Executive Committee of the Firm in connection with article written by Alexis Shane entitled "K&L Gates Calls Former Partner Serial Harasser" Law360 dated, November 20, 2020

4 All e-mails between all the members of the Executive Committee of the Firm relating to the article entitles "K&L Gates Ex-Partner's Bias Suit Stayed For Arbitration"

By Marco Poggio Law360 (March 25, 2021)

C. Compensation

1. The names of the partners who were allocated Mr Dennis' business origination credits after his expulsion on May 20, 2019, including the names of the clients (We need to determine if any of the witnesses financially benefited from the complaints filed against me);

2 The names of the partners who serviced Mr Dennis' clients after his suspension on January 19, 2019;

3. Copies of all Communications between and among [REDACTED] and the members of the Executive Committee with respect to the meeting with [REDACTED] of [REDACTED], [REDACTED] and Mr Dennis at the Pershing Square Cafe in August of 2017 .

4 Copies of all Communications between [REDACTED] and the members of the Executive Committee relating to the phone call [REDACTED] had with [REDACTED] of [REDACTED] relating to Mr Dennis on or about January 27, 2018.

5. All Communications between the members of the Executive Committee relating to Mr Dennis' e-mail in November of 2018 identifying a potential business conflict between [REDACTED] and [REDACTED]

6. Copies of all Communications between [REDACTED] and the members of the Executive Committee relating to Mr Dennis e-mail to [REDACTED] on Januaryrelating to [REDACTED] client billings.

7. Please provides copies of all financial information relating to Mr Dennis provided by the Firm to [REDACTED] Esq in February of 2019, in connection with Bailey v. Dennis.

8 Please provide copies of all Communications between [REDACTED] and the members of the Execituvie Committee relating to Mr Dennis' e-mails in October of 2020 to [REDACTED], the President and Chief Executive Officer of [REDACTED] relating to the Firm's offices in Beijing, Shanghai, Singapore and Taipei

D. Agreements /Complaints

1. Please provide a copy of the security agreement (s) wether so named or,otherwise between the Firm and the company retained by the Firm to conduct surveillance of Mr Dennis at the Corporate Counsel Women of Color annual conference in September of 2019 at the Chicago Marriott

2. Please provide a copies of all sponsorship agreements between thr Firm and the Corporate Counsel Women of Color. (I am being accused of racist and sexually harassing e-mails. In the last agreement I was specifically named as mandatory relationship partner because of my 17 years of support of the organization)

3. Please provide a copy of the complaint relating to Mr. Dennis filed by the Firm with the 17th Preceinct of the City of New York on or about September 4, 2019

4 Please copies of the following agreements -provide

- (a) Retainer Agreement(s) and engagement letters between the Firm and [REDACTED] along with any agreements or understandings reflecting either's stated or agreed upon diversity goals, if any.
- (b) Retainer Agreement(s) between Firm and [REDACTED] relating to the [REDACTED] class action litigation referenced in [REDACTED]'s e-mail dated December 2019 (the "[REDACTED] Litigation") along with any agreements or understandings reflecting either's stated or agreed upon diversity goals, if any.
- (c) Retainer Agreement(s) between the Firm, and [REDACTED] relating to the [REDACTED] Litigation, along with any agreements or understandings reflecting either's stated or agreed upon diversity goals, if any.
- (d) Retainer Agreement(s) between Firm and [REDACTED] relating to any matters in connection with [REDACTED]'s establishment of substantial new places of business in New York, New Jersey, Washington, DC, Virginia (the [REDACTED] per [REDACTED] e-mail communication to all partners dated November 2018) along with any agreements or understandings reflecting either's stated or agreed upon diversity goals, if any.
- (e) Retainer Agreement(s) between the Firm and [REDACTED].
- (f) Retainer Agreement(s) between the Firm and [REDACTED] along with any agreements or understandings reflecting either's stated or agreed upon diversity goals, if any.
- (g) Retainer Agreement(s) between Respondent and [REDACTED] along with any agreements or understandings reflecting either's stated or agreed upon diversity goals, if any.

E. Misc

1 Please provide a written explanation as to why [REDACTED] the President and General Counsel of [REDACTED] was included on the Southern District's No Contact List delivered on December 12, 2021.

As the Southern District has indicated it is ready for trial, so I would like to get this request out in the next couple of days.

As electronic interference continues with my e-mail account woc2020@gmail.com, please confirm receipt of this e-mail.

Thank you

Willie

Willie Dennis

Admitted New York, New Jersey and District of Columbia since 1988

* All the events referenced below, except the last item (Misc 2), occurred prior to the Firm filing complaints with the District Attorneys Office of the City New York and the Southern District of New York.

**The communications should include the communications of [REDACTED] General Counsel of the Firm and [REDACTED], Deputy General Counsel of the Firm